

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Chemtool Fire - Removal Polrep
Initial and Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
Oil POLREP Initial and Final
Chemtool Fire
C5TM
Rockton, IL
Latitude: 42.4718011 Longitude: -89.0646749

To: Craig Thomas, EPA R5
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Lauren McCarrell, USEPA R5
Corey Peaslee, USEPA R5
Cheryl Newton, USEPA R5
Doug Ballotti, EPA R5
Tom Short, EPA R5
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Jim Augustyn, U.S. EPA
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From: Craig Thomas, On-Scene Coordinator
Date: 8/13/2021
Reporting Period: 6/14/2021 - 6/24/2021

1. Introduction

1.1 Background

Site Number:	Z5TK	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	Emergency
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	6/14/2021	Start Date:	6/14/2021
Demob Date:	6/24/2021	Completion Date:	6/24/2021
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	6/14/2021
FPN#:	E21510	Reimbursable Account #:	

1.1.1 Incident Category

Emergency Response

This emergency response was conducted under both CERCLA and OPA authorities. Both CERCLA and OPA funds were used. This POLREP is written primarily for activities associated with OPA authorities during the response, although U.S. EPA conducted both CERCLA and OPA activities.

1.1.2 Site Description

The site is located at the Chemtool Incorporated facility in Rockton, Winnebago County, Illinois. At approximately 07:00 on June 14th, several fire departments from Illinois and Wisconsin responded to a large, six-alarm fire at the facility. Chemtool

Incorporated manufactures greases, additives, and other fluids. The facility has a storage capacity of over 4.7 million gallons of oil, and reportedly had over 1 million gallons of oil stored at the time of the fire. The facility quickly became fully-involved in the fire and had several explosions.

1.1.2.1 Location

The site is located at 1165 Prairie Hill Road in Rockton, Winnebago County, Illinois.

1.1.2.2 Description of Threat

The facility housed several tanks of various greases, oils, additives, and other fluids, that have been or could have been consumed in the fire. The smoke plume and runoff from the fire threatened to release contaminants into the atmosphere, as well as potentially discharging the contents of the tanks to the Rock River.

Over a million gallons of crude oil were stored on the facility at the time of the fire. Several 50,000-gallon tanks containing an unknown amount of oil were still standing on the west side of the facility, which is approximately 700 feet from the Rock River. The tanks and the structural supports for the tanks were both impinged by fire for several hours up to a full day, which caused both to show evidence of being in weakened states. Lubrizol was unable to allow structural engineers in to the facility to assess the tanks and supporting structures. Until the tanks and structural supports can be assessed by a structural engineer, Lubrizol has been unable to determine the volumes of oil still present within the tanks. Given the potentially large volume of oil in containers with compromised integrity, U.S. EPA believed there was substantial threat of discharge of oil to a navigable waterway.

U.S. EPA observed pools of what appeared to be viscous pure product as well as petroleum staining of soil in the wooded area immediately west of the facility, between the facility and Rock River. EPA START contractors collected samples of the pooled oil to be analyzed by the US Coast Guard Marine Safety Lab for oil fingerprint analyses.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On-Scene Coordinators (OSC) Craig Thomas, Matt Villicana, Lauren McCarrell, and Corey Peaslee mobilized to the site on June 14, 2021. On June 14, 2021, at approximately 09:30 hours, EPA Region 5 Phone Duty Officer activated the Superfund Technical Assessment and Response Team (START) to respond to the incident. An additional OSC (Robert Kondreck) was deployed 6/16.

According to the Rockton Fire Chief and Potentially Responsible Party (PRP), the fire was discovered at approximately 0700 hours on June 14, 2021. The Rockton Fire Department, Rockford Fire Department, and several other Fire Departments from Illinois and Wisconsin Mutual Aid Box Alarm System (MABAS) responded to the incident to conduct fire suppression activities.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

On June 14, 2021 the Rockton Fire Department along with several other fire departments from Illinois and Wisconsin Mutual Aid Box Alarm System (MABAS) were on-site performing fire suppression activities. A mandatory evacuation was issued for all residents within a one-mile radius at approximately 0700 on June 14, 2021. The evacuation center was located at the Roscoe Middle School in Roscoe, IL.

At the request of Illinois EPA, U.S. EPA deployed four OSCs and eight START contractors to the fire.

Through the morning of June 15th, the fire was still burning, however significant process was made on containing the blaze through usage of water from the Rock River in addition to foams starting at 1100 on 6/15.

PRP contractors placed containment and sorbent booms at multiple locations within the Rock River and interceptor trench. Vac trucks were deployed along the Rock River as a precautionary measure by the PRP contractors to ensure that neither oil nor foam made it into the river.

On Tuesday morning, June 15th, the RP asked the Incident Commander to allow the use of firefighting foam (the only available firefighting foam onsite at that time). The IC made the decision to allow usage of the foam; at the time it was unknown that the only foam on site at the time contained PFAS. Upon observing pumping operations beginning, U.S. EPA and Illinois EPA requested a halt to those operations until additional boom was deployed on the Rock River and vac trucks were put on standby at several stations downriver to ensure that any oil, foam or other materials were contained. In the early afternoon, the non-fluorinated foam Vapor Suppressant Product (VSP) arrived onsite and continued usage of foam was with the VSP.

Additional booms were placed in the Rock River in case of site runoff at 0900 on Wednesday 6/16. One additional OSC was deployed to the site and arrived at 1630 on June 16th.

On June 16th, the fire was still burning; however, the smoke was greatly reduced in volume as firefighting efforts continued. At 1230, the RP's contractors on site began removal of debris to provide access to the hotspots of the remaining blaze.

On 6/16/2021, after realizing that a significant quantity of oil may not have been consumed in the fire, U.S. EPA requested an FPN (E21510) to address the substantial threat of discharge of oil to a navigable waterway. U.S. EPA began charging 75% to CERCLA and 25% to the FPN starting 6/16.

During a site walk late evening on 6/16 with U.S. EPA and an RP contractor, evidence of stained soil and petroleum ponding was noticed outside of the interceptor trench. The interceptor trench was dry, and it was assumed that the ponding had occurred before installation of the interceptor trench. Evidence of degraded foam was found in several areas within the interceptor trench. A second interceptor trench was placed around the area affected by petroleum ponding, and the RP is using vac trucks and excavators to remove the affected soils.

On Friday morning, 6/18, excavation of the facility continued to garner access to hotspots on site. U.S. EPA and START collected a surface water sample from a recovery ditch that was adjacent to Interceptor Trench 1 on the south side of the facility. The sample was collected because there was observed stained soil in and around the ditch. At 1000 on June 18th, the evacuation order was lifted.

On June 19th the Rockton Fire Department Incident Commander turned incident command over to the Lubrizol Fire Chief. Excavation of the facility continued to allow firefighting access to hotspots on site.

Some flare-ups occurred overnight on 6/18, which caused heavy haze and smoke on site. An additional flare up occurred the morning of 6/19; however, the smoke greatly cleared as firefighting efforts continued. On 6/19, the RP's contractors continued removal of debris to provide access the hotspots of the remaining blaze.

On Sunday, June 20, 2021, the Lubrizol industrial firefighting contractor continued to use heavy equipment to sift through debris in search of hot spots to extinguish and managing flare ups as they occur.

Lubrizol environmental contractors continued to perform boom maintenance, fluid recovery with vacuum trucks, and runoff prevention activities.

Incident command was officially transitioned from the Rockton Fire Department to the Lubrizol Fire Chief.

On Monday, June 21, 2021, the Lubrizol industrial firefighting contractor continued to use heavy equipment to sift through debris in search of hot spots to extinguish and managing flare ups as they occur.

Lubrizol environmental contractors continued to perform boom maintenance, fluid recovery with vacuum trucks, and runoff prevention activities. Lubrizol environmental contractors also started construction of a clay berm between the property fence line and Interceptor Trench 1.

U.S. EPA and EPA START contractors conducted oversight of environmental activities being conducted by Lubrizol contractors including: boom maintenance, runoff recovery, and interceptor trench inspections.

U.S. EPA met with representatives from the U.S. Chemical Safety and Hazard Investigation Board, who were conducting an investigation of the incident.

EPA START contractors conducted a sediment assessment in the Rock River, searching for any evidence of submerged oil. No evidence of submerged oil was discovered during the assessment.

Lubrizol continued work to ensure that the fire was fully extinguished, prevent runoff from the site, and constructing a 5-foot tall clay berm to act as secondary containment for several 50,000-gallon tanks, containing an unknown amount of oil, that appeared to be in weakened states.

On Tuesday, June 22, the Lubrizol industrial firefighting contractor continued to use heavy equipment to sift through debris in search of hot spots to extinguish and managing flare ups as they occur. Lubrizol reported four remaining hot spots at the morning operations briefings.

Lubrizol environmental contractors continue to perform boom maintenance, fluid recovery with vacuum trucks, and runoff prevention activities. Lubrizol environmental contractors also started construction of a clay berm between the property fence line and Interceptor Trench 1. The purpose of the clay berm is to prevent a discharge of oil to the Rock River in the event one or more of the 50,000-gallon tanks containing unknown amounts of oil collapse.

U.S. EPA and EPA START contractors conducted oversight of environmental activities being conducted by Lubrizol contractors including: boom maintenance, runoff recovery, interceptor trench inspections, and clay berm construction.

On Wednesday, June 23, the Lubrizol industrial firefighting contractor continued to use heavy equipment to sift through debris in search of hot spots to extinguish and managing flare ups as they occur. Lubrizol reported two remaining hot spots at the morning operations briefing.

Lubrizol environmental contractors continued to perform boom maintenance, fluid recovery with vacuum trucks, and runoff prevention activities. Lubrizol environmental contractors continued construction of the clay berm between the property fence line and Interceptor Trench 1.

U.S. EPA and EPA START contractors conducted oversight of environmental activities being conducted by Lubrizol contractors including: boom maintenance, runoff recovery, interceptor trench inspections, and clay berm construction.

At the 1830 Operations Briefing on June 23, Lubrizol informed everyone that the final hot spots had been extinguished. Lubrizol continued fire watch activities, including thermal imaging drone flights, to ensure that no more hot spots appeared.

On Thursday, June 24, the Lubrizol industrial firefighting contractor continued to perform fire watch activities in order to ensure that no additional hot spots appear.

Lubrizol environmental contractors continued to perform boom maintenance, fluid recovery with vacuum trucks, and runoff prevention activities.

Lubrizol environmental contractors completed construction of the clay berm between the property fence line and Interceptor Trench 1 at approximately 1400 central time.

U.S. EPA and EPA START contractors conducted oversight of environmental activities being conducted by Lubrizol contractors including: boom maintenance, runoff recovery, interceptor trench inspections, and clay berm construction.

U.S. EPA and EPA START contractors demobilized from the Site on June 24th. U.S. EPA spent approximately 3.5 hours of an approximately 13 hour work day providing oversight of controls addressing the substantial threat of discharge of oil to a navigable waterway at the ChemTool facility. The completion of the clay berm installed on the west side of the building was designed to contain any potential spilled oil product from the storage tanks on-site. The berm mitigates the substantial threat of discharge to a navigable waterway. With the completion of the berm, U.S. EPA did not plan any additional charging to the FPN project.

START identified trailing costs associated with lab analysis, data validation and report writing.

On Monday, June 28, U.S. EPA received the results of the two oil samples sent to the United States Coast Guard Marine Safety Lab. The results indicate that both samples (sample numbers 21-043-01 and 21-043-02) were lubricating oils, with non-petroleum contamination present in both samples.

No additional request for assistance has been made of U.S. EPA. Therefore, U.S. EPA is issuing this first and final POLREP.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

The RP has been identified as Chemtool Incorporated, who is owned by Lubrizol. OSC Thomas issued a Notice of Federal Interest for both the Oil Pollution Act and CERCLA on June 14, 2021.

2.1.4 Progress Metrics

Regional Metrics

Miles of river systems cleaned and/or restored 0

This is an Integrated River Assessment.
The numbers should overlap.
Cubic yards of contaminated sediments removed and/or capped 0

Gallons of oil/water recovered 0

Acres of soil/sediment cleaned up in floodplains and riverbanks 0

Stand Alone Assessment
Number of contaminated residential yards cleaned up 0

Number of workers on site 32

Contaminant(s) of Concern Unknown

Oil Response Tracking

Estimated volume
Initial amount released 0

Final amount collected 0

FPN Ceiling Amount \$50,000.00

CANAPS Info
FPN Number E21510

Body of Water affected Rock River

Administrative and Logistical Factors (Place X where applicable)

Precedent-Setting HQ Consultations (e.g., fracking, asbestos) x Community challenges or high involvement Radiological

More than one PRP Endangered Species Act / Essential Fish Habitat issues Explosives

AOC Historic preservation issues x Residential impacts

UAO x NPL site x Relocation

DOJ involved Remote location Drinking water impacted

Criminal Charges Have Been Filed* Extreme weather or abnormal field season X Environmental justice

Tribal consultation or coordination or other issues x Congressional involvement x High media interest

Statutory Exemption for \$2 Million Statutory Exemption for 1 Year x Active fire present

Hazmat Entry Conducted – Level A, B or C Incident or Unified Command established x Actual air release (not threatened)

Green Metrics

Metric	Amount	Units
Diesel Fuel Used	N/A	N/A
Unleaded Fuel Used	N/A	N/A

Alternative/E-85 Fuel Used	N/A	N/A
Electricity from Coal	N/A	N/A
Electricity from solar/wind	N/A	N/A
Electricity from grid/mix	N/A	N/A
Solid waste used	N/A	N/A
Solid waste recycled	N/A	N/A

2.2 Planning Section

2.2.1 Anticipated Activities

Emergency operations have transitioned into Remediation operations. Illinois EPA will oversee remediation operations. Once remediation operations are completed, restoration operations will be conducted.

U.S. EPA will continue to discuss the situation with the State and Lubrizol, and provide guidance and input as requested.

2.2.2 Issues

No issues occurred during this reporting period.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

On 6/16/2021, U.S. EPA requested an FPN (E21510) to address the substantial threat of discharge of oil to a navigable waterway. U.S. EPA began charging 75% to CERCLA and 25% to the FPN starting 6/16.

For 6/24/21, U.S. EPA spent approximately 3.5 hours of an approximately 13 hour work day providing oversight of controls addressing the substantial threat of discharge of oil to a navigable waterway at the ChemTool facility. The completion of the clay berm installed on the west side of the building was designed to contain any potential spilled oil product from the storage tanks on-site. The berm mitigates the substantial threat of discharge to a navigable waterway. With the completion of the berm, U.S. EPA does not plan any additional charging to the FPN project.

START identified trailing costs associated with lab analysis, data validation and report writing.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
START	\$300,000.00	\$250,000.00	\$50,000.00	16.67%
Intramural Costs				
USEPA - Direct	\$30,000.00	\$28,000.00	\$2,000.00	6.67%
Total Site Costs	\$330,000.00	\$278,000.00	\$52,000.00	15.76%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

The Lubrizol Fire department contractors are providing a safety officer

2.5.2 Liaison Officer

Francisco Arcaute fulfilled this role.

2.5.3 Information Officer

EPA had a Public Information Officer established for this response

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

EPA Region 5

Illinois EPA

Illinois Emergency Management Agency

Illinois Civil Support Team

Illinois Department of Public Health

Illinois State Police

Mutual Aid Box Alarm System

Occupational Safety and Health Administration

US Chemical Safety Board

Winnebago County Department of Public Health

Winnebago County Sherriff's Department

Ogle County Sherriff's Department

4. Personnel On Site

EPA - 5

START - 10

Illinois EPA - 4

IL CST - 8

Firefighters from multiple fire departments.

Lubrizol

Clean Harbor

ER

HEPACO

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

response.epa.gov/chemtoolfire

6.2 Reporting Schedule

This is the final POLREP. No additional POLREPS will be provided.

7. Situational Reference Materials

response.epa.gov/chemtoolfire



